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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

June 9, 1994

William Caton
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

RE: CC Docket No. 92-237

Dear Mr. Caton:

It has been brought to my attention that copies of MCI's "Comments" filed on June 7, 1994 in the above-referenced proceeding were missing Page 17 due to an inadvertent copying error.

To rectify this problem, MCI is resubmitting copies of the filing in its entirety.

Please telephone me if you have any questions. I regret any inconvenience this may have caused.

Sincerely,

Donald J. Elardo

Enclosures

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JUN - 9 1994

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Administration of the
North American Numbering Plan

)
) CC Docket No. 92-237
) Phases One and Two
)

COMMENTS

MCI TELECOMMUNICATIONS CORPORATION

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Dated: June 7, 1994

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SUMMARY

MCI concurs in the Commission's tentative decision that NANP administrative functions would best be handled by an impartial non-governmental entity. This administrator should be an entity selected through a competitive bid process and should receive direction from an "Oversight Committee," eligibility for which should be open to all parties with interest in numbering assignments. The Committee and the NANP administrator could be sponsored by the Alliance for Telecommunications Industry Solutions (ATIS), provided that such organization comes to recognize the interests of its broadened constituency and is amenable to establishing an effective industry numbering policy development structure and processes and, further, an effective dispute-resolution mechanism.

It is essential that the Commission exercise its plenary jurisdiction over numbering matters and provide clear policy direction, especially in connection with establishing the Committee's structure and processes and dispute-resolution mechanism. Experience shows -- and likely will continue to show -- that reaching consensus in the numbering arena is difficult to achieve and, therefore, sound structure and processes are essential to ensure that industry positions on numbering reach the Commission for timely action, whether by consensus or as the results of arbitration.

The Commission should not delay in addressing issues associated with local number portability because portability is a

crucial to achieving effective competition in local markets. Also, the Commission, in the interest of consumers, should, as necessary, exercise its plenary jurisdiction over numbering to assure uniform toll dialing patterns. And, finally -- again in the interests of consumers -- local exchange carriers should be required to deliver to the interexchange carrier pre-selected by the consumer all interstate calls made by those consumers.

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OFFICE OF SECRETARY

In the Matter of)
Administration of the) CC Docket No. 92-237
North American Numbering Plan) Phases One and Two

COMMENTS

MCI Telecommunications Corporation (MCI) hereby furnishes its comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding.¹

INTRODUCTION

In "Phase One,"² the Commission, as an outgrowth of comments received in response to its October 1992 Notice of Inquiry (NOI) herein,³ is proposing to establish a new entity to administer the North America Numbering Plan (NANP) in place of Bellcore, the current NANP administrator.⁴

¹ FCC 94-79, released April 4, 1994.

² The Commission has established two distinct "phases" in this proceeding, both of which will be addressed in these Comments.

³ Administration of the North American Numbering Plan, Notice of Inquiry, CC Docket No. 92-237, FCC 92-470, released October 29, 1992. MCI will briefly summarize the positions it advanced in the NOI proceeding.

⁴ Bellcore has advised the Commission that it has decided to step aside as NANP administrator. See Letter from G. Heilmeier, President and CEO, Bellcore, to Commission, dated August 19, 1993.

Specifically, the Commission tentatively has concluded that the ministerial administration of the NANP should be undertaken by a single non-government entity established by the Commission (and, therefore, subject to its oversight) but also separate from it and not closely identified with any particular industry segment. In addition, the Commission has requested further comment on whether a new numbering "Policy Board" should be established to assist regulators in the numbering arena.

To fund the new entity, the Commission is proposing to establish a schedule of fees payable by those assigned, or who otherwise directly benefit from the use and regulation of, telephone numbers within the United States portion of World Zone 1 (WZ1). These fees would be used to offset the costs incurred by the Commission in regulating numbers. Finally, the Commission is seeking comment on the need for a nationally uniform dialing pattern that would use the digit "1" as a toll-call identifier.

Other "Phase One" matters determined not to be a proper subject of this NPRM proceeding include assignment of 500 Service Access Codes (SACs) to subscribers, which the Commission expects the Bureau to handle separately during the pendency of this proceeding,⁵ and issues involving local

⁵ See Letter from A. Richard Metzger, FCC, to Ronald R. Conners, Bellcore, dated May 3, 1994. The Bureau therein indicates its desire to have Bellcore assign SACs without
(continued...)

number portability, which the Commission expects to address in some future proceeding.⁶

With regard to "Phase Two," the Commission tentatively has decided that "Feature Group D" (FGD) Carrier Identification Codes (CICs) should be expanded from a three-digit to a four-digit format in order to accommodate growing demand in the near term.⁷ The Commission is also seeking comment on whether it should require local exchange carriers (LECs) in equal access areas to deliver interstate, intraLATA "1+" MTS calls to the carrier pre-selected by the end user.

MCI POSITION -- NOI

In its NOI Comments, MCI proposed that Bellcore be replaced as the Administrator of the NANP with a neutral NANP "Registrar, which takes direction from an open-industry

⁵(...continued)

delay on an "open, fair, and non-discriminatory" basis -- one that does not allow the codes to be "assigned frivolously, hoarded by assignees, or prematurely exhausted." MCI applauds this action and looks forward to full achievement of the Bureau's goals in SAC assignments.

⁶ MCI, as noted herein, urges the Commission to institute, in the public interest, a proceeding that addresses local number portability as promptly as possible.

⁷ The Commission is proposing a six-year transition period to accomplish this important change, during which subscribers could use either CIC format to access their carrier's service.

NANP "Council."⁸ This structure would separate policy formulation from the administrative function and would remedy, MCI concluded, deficiencies existing under the current regime.⁹ Importantly, it also would provide a central focus for the treatment of numbering issues, thereby ending the multitude of fora in which such issues currently are addressed and the often confusing outcome of such proceedings.¹⁰

Under MCI's proposal, a "Council" would oversee industry discussions on numbering issues. Significantly, it would not set policy but, rather, would facilitate the industry's ability to reach consensus resolutions through a committee system. The NANP "Registrar," on the other hand, would perform strictly ministerial functions, such as assigning numbers and keeping records of number assignments.

The Commission's role in the regime proposed by MCI would include the establishment of guidelines and procedures

⁸ Comments of MCI Telecommunications Corporation, CC Docket No. 92-237, dated December 28, 1992, at 2-15. (MCI Comments) Emphasis was placed on the critical need for numbering matters to be handled in a fair and equitable manner, with number administration performed "in an environment free from the prejudicial influences that exist in the current structure." (at 14-15)

⁹ MCI's proposal was intended to make the numbering process more certain, to increase the opportunities for small entities to participate, and to shorten the cycle time of industry activities. See MCI Comments at 24.

¹⁰ The disadvantages of multiple fora seeking to treat the same or related numbering issues were discussed at some length by MCI. See MCI Comments at 15-19.

to facilitate the policy/business decision-making process.¹¹ The Commission also would place "consensus resolutions" reached by the Council on an expedited public comment cycle, would address remaining issues, as necessary, in rulemaking or in enforcement arenas,¹² and would interact with its regulatory counterparts in Canada and in the Caribbean. Significantly, the Commission would be the ultimate authority in deciding how numbering assets were to be allocated and managed, after due consideration of the competing interests of all interested parties.

Substantively, MCI offered two recommendations for modifying NANP numbering arrangements for future application.¹³ One approach was simply to use a longer numbering format, i.e., increasing the traditional 10-digit numbering format, to accommodate growing demand and the approaching exhaustion of available numbers; and the other was to include carrier/network "identifiers" in numbers so that particular numbers could be used to identify call-handling.¹⁴ Also, MCI recommended that the Commission

¹¹ Use of the term "Commission" in these Comments shall mean the Federal Communications Commission, as well as its counterparts in the other countries of the NANP.

¹² The Commission's complaint process would be available as the final means of addressing disputes that were not resolvable by consensus or through rulemaking.

¹³ MCI Comments at 25-27.

¹⁴ Number/code expansion must, of course, fall within applicable ITU-T international standards.

consider "local number portability" and numbering for PCS (which it has declined to do in the context of this proceeding), and international and NANPA cost recovery issues (which it has agreed to address).

MCI POSITION

"PHASE ONE" Matters

I. NANP Administration and Related Issues

MCI concurs in the Commission's tentative conclusion that NANP administrative functions would best be performed by a single non-government entity, subject to Commission oversight. The new administrator must be a neutral "third party" -- without ties or loyalties that would result in pre-judgments -- which performs only ministerial, administrative functions associated with the numbering activities identified by the Commission.¹⁵

This administrator should receive direction from a newly-formed "Oversight Committee," eligibility for which should be open to all parties to be materially affected by the NANP.¹⁶ Further, MCI concurs in the tentative Commission conclusion that the new administrator should also

¹⁵ See NPRM at paras. 26-27.

¹⁶ The Committee should include entities from all the member nations of the NANP, which should abide by determinations made by the Committee.

perform the additional functions associated with the assignment of Central Office codes.¹⁷

MCI believes that both the Committee and the NANP administrator could be sponsored by the Alliance for Telecommunications Industry Solutions (ATIS) -- which itself should be structurally separated from the day-to-day administrative undertakings of the Committee and the administrator¹⁸ -- provided that ATIS is amenable to establishing an effective industry numbering policy development structure and processes and, further, an effective dispute-resolution mechanism.

ATIS, it should be noted, has only recently opened its membership to non-LECs. It thus has no experience in addressing issues other than from the perspective of the single group whose interests it has represented over the years; and this has manifested itself, unfortunately, in recent efforts to reach consensus, including the preparation of comments to be filed in this proceeding. Accordingly,

¹⁷ NPRM at Para. 29. The administrator would not serve as the WZ1 numbering spokesman at domestic or international numbering functions; rather, such liaison activities would be at the direction of the Committee.

¹⁸ However, MCI believes that ATIS should be allowed to provide appropriate administrative functions for the Oversight Committee and subcommittee activities associated with developing numbering policy recommendations. Appropriate undertakings would include performing secretarial functions, such as distribution of meeting notices and planned agendas, the keeping of meeting minutes, and other record-keeping duties essential to the successful performance of the organization.

MCI is unable, under the circumstances, to unconditionally endorse ATIS as the entity to handle numbering issues on behalf of the industry, although it is willing to continue to attempt to work within ATIS in the hope of causing it to come to recognize the broader interests and positions of its enlarged membership.

In any event, prior to the its appointing ATIS to assume so important an industry role, the Commission itself must address and resolve within this proceeding several open and highly contentious issues concerning the structure, processes and procedures to be employed in addressing numbering issues. These include the development and adoption of numbering policies, issue resolution processes, administration, international co-ordination, and the crucial dispute-resolution mechanism.

The industry has failed to reach consensus in these critical areas, despite years of lengthy and thorough debates in the Future of Numbering Forum (FNF) and the ATIS-sponsored Carrier Liaison Committee (CLC). During this time, it has become apparent where lines of disagreement are drawn and, therefore, it would be inappropriate, indeed immensely counter-productive, if the Commission were to simply refer these unresolved issues back to the industry for further -- and likely futile -- debate. Accordingly, MCI submits that the Commission must address and decide these critical questions at the earliest opportunity,

specifically, within the context of this proceeding.

Even ATIS itself has been unable to reach accord beyond basic principles, such as the need for openness, due process, centralization of current numbering activities and the use of a consensus process. MCI, of course, concurs in these principles, but submits that the Commission must now weigh in to address and decide the next level of issues so that a structural framework can be implemented as promptly as possible to accommodate fairness, efficiency and timely issue resolution.

MCI believes that the new NANP administrator should be selected by an "open bidding" process. This process would involve Committee recommendations and ATIS Board of Director approval for both the Request for Proposal (RFP) to issue in the first instance and, of course, the actual selection of the contractor. Then the contract would be let by ATIS as the sponsoring legal entity.¹⁹

¹⁹ The Commission, as noted in the NPRM (paras. 13, 32-33), possesses broad authority to impose fees to recover costs associated with its regulatory undertakings. However, it is unclear to what extent, if any, the Commission could (or should) impose and collect fees if ATIS, a non-governmental entity, were to derive and make policy recommendations to the Commission for adoption (via the recommended Committee) and, further, if ATIS were to select a "third-party" NANP administrator.

Parties interested in numbering who become members of ATIS ought not to be required to pay twice -- first to ATIS to sustain its functions and, then, to the Government -- unless the latter's performance in numbering is both distinct and sufficiently substantial so as to warrant

(continued...)

MCI seriously questions whether the Committee will be able to reach agreement on the RFP requirements, as well as the terms and conditions of the contract that would govern the new administrator. If MCI's reservations are well taken, and there is every indication that they are, MCI submits that it will be necessary for the Commission to intervene and relieve ATIS of this responsibility and undertake itself to hire and manage the new NANP administrator.

MCI believes that its "Numbering Process Proposal" (FNF/94-042), a copy of which is appended hereto and incorporated herein as Attachment A, furnishes a sound basis upon which to end the posturing and redundant argument that too often accompanies discussions and delays resolution of important issues. The proposal provides that arbitration be used as the means to resolve disputes, when consensus is not achievable.²⁰

Specifically, the forum processes would have a target date for resolution of any given numbering issue. If that date is approaching and consensus has not been achieved (and

¹⁹(...continued)
imposition of fees separate from those that otherwise would apply, e.g., in the complaint process.

²⁰ The enclosed proposal employs the term "mediation" as distinct from arbitration. In fact, the process contemplated would result in a binding decision with respect to the industry numbering activity presented for decision. In effect, then, the process is a substitute for consensus and is the equivalent of arbitration.

does not seem achievable by the established deadline), arbitration could be chosen to end the impasse. Any participant could invoke arbitration, provided it was willing to pay the costs associated with the process. The arbitrator would hear from any participant wishing to be heard, and would render a decision on the open issues based upon the hearing. All the benefits that attend the arbitration process would be available, including, perhaps most important, a prompt result.

The results of arbitration, as noted, would be binding on the Committee to the same extent that any industry consensus is binding, and would be incorporated in relevant documents issued, without any further debate. However, any participant who believed that the arbitration process was flawed would have the right to file a formal complaint with the Commission or with an appropriate WZ1 government/regulatory body to seek review of the ruling.²¹

MCI does not support establishing a "Policy Board" with industry representation because, among other things, that might place industry representatives in a conflict-of-interest position.²² MCI submits that it is the

²¹ This is similar to what occurs today when an industry forum makes a decision and publishes it and a party petitions the Commission to review the action.

²² See NPRM at paras. 19-25. MCI does not believe that the Committee it recommends be created -- in lieu of any "Policy Board" -- raises difficult questions under the Federal
(continued...)

responsibility of the Commission (with its plenary jurisdiction over numbering in the US), along with the other regulators within WZ1, to make numbering policy.

Accordingly, MCI recommends that the Commission concentrate its efforts on establishing a fair and efficient industry mechanism to handle numbering issues, while recognizing that there will always likely exist subsets of issues which the industry is not capable of resolving through consensus. It is in such instances that regulatory authorities will need to provide direction through decision-making. Furthermore, it should be obvious, the creation of such a Board would only result in the imposition of an unnecessary layer of bureaucracy to further confound the processes.

Finally, the Commission and other WZ1 regulators should develop a funding plan which will accommodate full recovery

²²(...continued)

Advisory Committee Act, P.L. No. 92-463, 5 U.S.C., Appendix 2, even though the Committee would be established and utilized by the Commission to obtain policy advice on numbering matters. See Public Citizen v. U.S. Dept. of Justice, 491 U.S. 452 (1989); see, also, Nader v. Baroody, 396 F. Supp. 1231 (D.D.C. 1975). As the Supreme Court stated in Public Citizen, read literally -- which the Court refused to do -- the statutory language would extend the Act's requirements to any group of two or more persons, or at least to any formal organization, from which an agency might seek advice. 491 U.S. 2566. See, also, Nat. Anti-Hunger Coalition v. Executive Committee, 557 F. Supp. 524 (D.D.C.), aff'd 711 F.2d 1071 (1983.)

Clearly, the Act would not extend to the NANP administrator because its functions would be ministerial, and not at all advisory. See HLI Lordship Industries v. Committee for Purchase, 615 F. Supp. (D.C. Va. 1985.)

of the costs associated with administration, sponsorship, and oversight functions. Consistent with its past commitments on the subject, MCI is willing to pay its fair share of the costs associated with administering numbering programs.

II. Local Number Portability

In the NPRM, the Commission determined that, despite substantial interest in the topic -- and its undisputed importance to the promotion of competition in local exchange markets, it would defer consideration of questions relating to local number portability to a "future proceeding."²³ The reason for such deferral, according to the Commission, was its belief that "far more study of the technical feasibility, implementation costs, and overall benefits of such portability is needed before we can determine whether this Commission should mandate local number portability."²⁴

MCI submits that, until local number portability is mandated and available to consumers, there cannot exist a competitive environment in which all competitors, existing and new, will be able to compete on a fair and equal basis.

²³ NPRM at Para. 42. By "local number portability," MCI means the ability of a customer to change telephone service suppliers while retaining his or her unique telephone number.

²⁴ Id.

Accordingly, MCI strongly urges the Commission to promptly institute whatever proceeding(s) it believes may be necessary to address and decide local number portability issues.²⁵ Otherwise, it is highly unlikely that effective competition will develop because of the reliance by individuals, particularly business customers, on the local telephone numbers currently "owned" by monopoly local carriers.

In this regard, the "800 experience" is especially instructive. Until 1987, the interexchange inbound calling market segment was the monopoly preserve of AT&T Corp. (AT&T).²⁶ In 1987, MCI and others finally were able to enter the market as a result of an ability to acquire certain interconnections of the type made available to AT&T by the local exchange carriers.

To win business from AT&T, competitive carriers had to

²⁵ It seems apparent to MCI that "interim" or temporary solutions may need to be implemented, with permanent solutions -- in which true "equal access" occurs -- deferred until such time as technical and operational changes are made to existing local exchange networks to fully accommodate competition. With this the case, namely, that there will be inferior or "unequal access" available to new competitors for some period of time, that fact will need to be taken into appropriate account when local exchange carriers set interconnection rates for those needing access to their "bottleneck" facilities in order to compete.

²⁶ 800 services were first introduced by AT&T in 1967 and, therefore, were available exclusively from AT&T for a 20-year period during which many large telecommunications users acquired from AT&T and advertised 800 telephone numbers that they came to perceive as "business assets" of substantial value.

convince users to accept "new" 800 numbers in place of those which they had been using for many years. This was a most difficult "sell," which translated into the inability, in the absence of 800 number portability, of competitive carriers to be able to compete effectively in the 800 services market segment.²⁷

This same number "ownership" characteristic will burden competition in local exchange markets. Only when full number portability occurs -- as was finally achieved in the 800 market in May 1993 -- will there result a full potential for effective competition in local markets. The longer the Commission delays in approaching this question, the longer the benefits of competition will remain unavailable to consumers. In view of the foregoing, MCI encourages the Commission to institute and conclude the promised proceeding on local number portability at the earliest opportunity. MCI stands prepared to assist the Commission in any way it can to expedite that proceeding.

III. "1+" Toll Dialing

In its NPRM, the Commission seeks information on

²⁷ Competitive carriers were obliged to sell on price and were responsible, as a result thereof, of expanding the market significantly for inbound calling services. They thus were able to garner a fair share of new business, but were largely unable to acquire "old" business, which consisted of large users "tied" to their assigned AT&T 800 numbers.

specific current or future problems presented by non-uniform dialing arrangements, and the specific steps the Commission should take to remedy those problems.²⁸ In the absence of uniformity among the states -- which translates into one-plus-10 digits for toll dialing -- there will be substantial customer confusion. This is because, if the toll indicator, "1," is removed, such that seven-digit dialing results in toll call placement, consumers would be unaware that they were making toll calls in lieu of presumed local calls. This "prior knowledge" of uniform dialing procedures translates into customers' possessing complete control over whether they make a call, or how long the call should be.

MCI has addressed in detail the problems that would arise if seven-digit dialing resulted in toll calls in an ex parte letter responsive to Ad Hoc's, which letter was filed on May 27, 1993. A copy of said letter is appended hereto and incorporated herein as Attachment B. If necessary, the Commission should be prepared to exercise its plenary authority over numbering and pre-empt, in the interests of consumers, any inconsistent state regulation.

²⁸ Non-uniform toll dialing results when states adopt different approaches for the dialing of toll calls. The instant issue resulted from a proposal made by Bellcore to eliminate the use of the digit "1" as a toll-call identifier as part of its implementation of "interchangeable numbering plan area" (INPA) codes, and the response thereto of the Ad Hoc Telecommunications Users Committee (Ad Hoc). Letter from James S. Blaszak, Ad Hoc, to Donna R. Searcy, FCC, dated May 6, 1993.

"PHASE TWO" Matters

I. Carrier Identification Code Expansion

MCI concurs in the plan to expand three-digit FGD CICs to four-digits, beginning in January 1995, in order to meet growing demand for carrier codes, which are approaching a state of exhaustion. In addition, MCI does not oppose the proposed six-year transition period during which three-digit CICs may be sued with either a five or seven-digit carrier access code (10XXX or 1010XXX).

II. Interstate, IntraLATA Toll Call Handling

MCI strongly urges the Commission to find and conclude that the public interest requires that local exchange carriers be required to cease and desist from screening and completing interstate, intraLATA "1+" MTS calls and, instead, deliver those calls to the interexchange carrier pre-selected by the subscriber. There is no conceivable justification, including any jurisdictional basis, for denying these calls to their rightful carriers. And, clearly, there is no conceivable consumer interest in denying their interexchange carriers the ability to carry these calls.²⁹

²⁹ See NPRM at Para. 57, n.94, wherein the Commission determined that a 30-mile call handled by Bell Atlantic within the Greater Washington, DC area is more expensive than a coast-to-coast call handled by MCI or AT&T.

Accordingly, the heaviest of burdens should be placed on those who wish to have continued, to the obvious detriment of interexchange carriers and consumers, the practice of local exchange carriers handling (and overcharging for) close-in, interstate calls.

CONCLUSION

The Commission should take into account the Comments set forth herein in fashioning its policies and programs for regulating numbers associated with the provision of telecommunications services.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

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Dated: June 7, 1994

ATTACHMENT A

MCI

FNF/94-042

FUTURE OF NUMBERING FORUM

SOURCE: Peter Guggina
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1225/107
2400 North Glennville Drive
Richardson, TX 75082
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TITLE: Structure/Sponsorship and Numbering Process Proposal

ABSTRACT:

MCI proposes adoption of Structure "Alternative 6" with the Oversight Committee (OC) combined with the Industry Numbering Forum (INF) as depicted in the attached figure (Attachment 1). After resolving the ATIS membership eligibility issue for non-US WZ 1 entities, ATIS could sponsor the OC/INF, but the OC/INF would operate as an independent entity with its own legal counsel. The OC/INF would manage the NANPA activities and approve the ATIS third party contract of the NANPA.

This proposal is conditioned upon adoption of the MCI "Numbering Process Proposal", FNF/94-002, (Attachment 2) which was introduced at FNF 4, January 18-20, 1994.

DISTRIBUTION: FNF

This contribution is submitted to the Future of Numbering Forum for the purpose of discussion and is not to be considered a binding proposal on MCI. MCI reserves the right to modify or withdraw this proposal at any time.